

### **III. REMARKS**

Claims 1-18 are pending in this application. By this amendment, claims 1, 8 and 12 have been amended. Applicants do not acquiesce in the correctness of the rejections and reserve the right to present specific arguments regarding any rejected claims not specifically addressed. Further, Applicants reserve the right to pursue the full scope of the subject matter of the original claims in a subsequent patent application that claims priority to the instant application. Reconsideration in view of the following remarks is respectfully requested.

In the Office Action, claims 1-18 are rejected under 35 U.S.C. §112, first paragraph, as allegedly failing to comply with the written description requirement. Claims 1-18 are rejected under 35 U.S.C. §103(a) as allegedly being unpatentable over Chouinard (U.S. Patent No. 6,671,701), hereafter “Chouinard,” in view of Campbell *et al.* (U.S. Patent No. 6,856,970), hereafter “Campbell,” and Brandt *et al.* (U.S. Patent No. 6,714,979), hereafter “Brandt,” and further in view of Chen *et al.* (U.S. Patent No. 6,301,681). Applicants traverse the rejection for the following reasons.

#### **A. REJECTION OF CLAIMS 1-18 UNDER 35 U.S.C. §112, FIRST PARAGRAPH**

The Office has asserted that claims 1-18 fail to satisfy the written description requirement. Specifically, the Office asserts that the subject matter “wherein the document messages transfer information about the back office system,” was not described in the specification in such a way as to reasonably convey to one skilled in the relevant art that the inventors, at the time the application was filed, had possession of the claimed invention. Applicants, have amended claims 1, 8 and 12 to recite “wherein the document messages transfer

information about changes to data in the back office system. Applicants submit that this amendment is supported by the specification and that no new matter has been added. See e.g. Page 13, lines 6-16. Accordingly, Applicants request that the rejection be withdrawn.

The Office further asserts that the subject matter “wherein the method is adapted to process the document messages in an appropriate time sequence even if the timestamp of the previously received document message is more recent than the timestamp of the new inbound message,” was not described in the specification in such a way as to reasonably convey to one skilled in the relevant art that the inventors, at the time the application was filed, had possession of the claimed invention. Applicants have amended claims 1, 8 and 12 to recite “wherein the method is adapted to process the document messages in a synchronous time sequence even if the timestamp of the previously received document message is more recent than the timestamp of the new inbound message.” Applicants submit that one of the stated purposes of the invention is “...eliminating the consistency problems arising from inbound messages being processed out of their proper time sequence.” Page 4, lines 10-16. The problem is further illustrated by an example in the specification in which messages having timestamps that are more recent are generated before messages that have earlier timestamps. Page 14, paragraphs 2 and 3. These messages, in the example in the specification, “...will be received and processed out of sequence.” Page 14, line 19. To this extent, in the example in the specification, the message that has the more recent time stamp is processed prior to the earlier message, i.e., asynchronously. As part of the solution to this problem, the claimed invention recites:

If the timestamp of the inbound message is more recent (i.e., newer) than the timestamp of the Primary Key row entry found in the MSGSYNCH table, continue processing the inbound message according to a predetermined process path. The web-based application database is updated with the document in the more recent inbound message. The

timestamp information in the MSGYNCH table is also updated to reflect the timestamp of the more recent document.

If the timestamp of the inbound message is not more recent than the timestamp of the located Primary Key row entry, the inbound message is not processed further according to the predetermined process path. Page 17, second and third paragraphs.

To this extent, the claimed invention teaches that even if, as in the aforementioned example, a new inbound message is received that has a timestamp that is earlier than a previously received message, the invention as supported by the specification can nevertheless process the messages in a synchronous time sequence. Thus, Applicants respectfully submit that the feature is supported by the specification. Accordingly, Applicants respectfully request withdrawal of the rejection.

#### **B. REJECTION OF CLAIMS 1-18 UNDER 35 U.S.C. §103(a)**

With regard to the 35 U.S.C. §103(a) rejection over Chouinard, Campbell, Brandt, and Chen Applicants initially assert that the combined features of the cited art fail to teach each and every feature of the claimed invention. For example, with respect to independent claims 1, 8 and 12, Applicants submit that the cited references fail to teach or suggest that the document messages transfer information about changes to data in the back office system for integrating the first back office system and the web-based application. The Office equates the document messages of the claimed invention with the transmitting of files of data in Chouinard. Office Action, page 12. However, even though the files of data in Chouinard may be transmitted, they are still files and not messages. Furthermore, the files of data in Chouinard are files of data and not messages that transfer information about changes to data.

In contrast, the claimed invention includes "...the document messages transfer information about changes to data in the first back office system for integrating the first back

office system and the web-based application.” Claim 1. As such, the document messages of the claimed invention are not simply files that may be transmitted as in Chouinard, but instead are messages that transfer information about changes to data in the first back office system for integrating the first back office system and the web-based application. Thus, the document messages as included in the claimed invention are not taught or suggested by the files of data of Chouinard. Neither Campbell nor Brandt cures this deficiency. Accordingly, Applicants respectfully request that the Office withdraw its rejection.

With still further regard to independent claims 1, 8 and 12, Applicants assert that the cited references fail to teach or suggest that the method is adapted to process the document messages in a synchronous time sequence even if the timestamp of the previously received document message is more recent than the timestamp of the new inbound message. The Office admits that Chouinard, Campbell and Brandt do not explicitly disclose this feature. Instead, Office cites a passage in Chen, which teaches “[t]he message priority indicates the order in which messages are processed, with higher priority messages being processed before lower priority messages.” Col. 7, lines 27-29. To this extent, Chen teaches processing messages according to priority and not processing messages in a time sequence. Furthermore, to the extent that Chen teaches indicating an order of message, it is not in a synchronous time sequence. In fact, the processing of messages of Chen according to priority expressly teaches against processing the messages according to a synchronous time sequence.

In contrast, the claimed invention includes “...wherein the method is adapted to process the document messages in a synchronous time sequence even if the timestamp of the previously received document message is more recent than the timestamp of the new inbound message.”

Claim 1. As such the processing of the document message of the claimed invention does not merely process messages according to priority as does Chen, but rather is adapted to process the document messages in a synchronous time sequence even if the timestamp of the previously received document message is more recent than the timestamp of the new inbound message. For example, if a message *A* is created prior to a message *B* (and therefore message *A* has a time stamp that is before message *B*) but message *B* is received at the web-based application before message *A*, the messages are still processed in the correct time sequence. Thus, the processing of the document messages as included in the claimed invention is not taught or suggested by the priority message processing of Chen. Accordingly, Applicants respectfully request that the Office withdraw its rejection.

With regard to claims 2, 14 and 16, Applicants submit that, contrary to the Office's assertion, Chouinard fails to teach or suggest that the primary key comprises document type information and document identification information. Instead, the passage of Chouinard cited by the Office teaches that "...the date and time stamps of all of these source files are compared against the database that contains file name, date and time information for converted or destination files." Col. 2, lines 14-44. To this extent, the Chouinard database contains only two types of information, namely file name and date and time information. Chouinard does not teach a primary key that is distinct from the timestamp and includes both document type information and document identification information. Furthermore, Chouinard only teaches documents of one type, that is CAD documents, and Chouinard does not teach that this document type information is included in a primary key.

In contrast, the claimed invention includes documents, "...the documents each being identified with a primary key code and a timestamp designating the time of creation of each document," "...wherein the primary key comprises document type information and document identification information." Claim 2. As such, the primary key as included in the claimed invention is not simply a time and date stamp as in Chouinard, but instead is separate from the timestamp and includes both document type and document identification information. For the above stated reasons, the features of Chouinard cited by the Office are not equivalent to the primary key as included in the claimed invention. Neither Campbell nor Brandt cures this deficiency. Accordingly, Applicants request that the Office withdraw its rejection.

Furthermore, as argued previously by Applicants, there is no motivation to combine the Chouinard and Brandt references. One of the stated objects in Chouinard is to simplify and automate the file conversion process. Adding the database of Brandt would only add an additional component to the system without providing additional functionality, which is in opposition to Chouinard's stated goal of simplicity. Accordingly, the combination of the database in Brandt with the Chouinard system would destroy the stated purpose of Chouinard, namely, simplicity. In addition, neither Chouinard nor Brandt addresses the problem that is solved by the claimed invention, that is, synchronizing inbound messages to avoid the problems caused by messages arriving in a system in an incorrect order. Accordingly, the combination of Chouinard with Brandt to solve this problem is not obvious. For the above reasons, the Office has failed to provide a *prima facie* case of obviousness. Accordingly, Applicants request withdrawal of the rejection.

Still further, Applicants submit that there is no motivation to combine Chen with Chouinard. Chouinard deals with a file storage in different formats. In contrast, Chen is concerned with transfer of message between systems. As such the two are in non-analogous fields of art. For this reason, the Office has failed to provide a *prima facie* case of obviousness. Accordingly, Applicants request withdrawal of the rejection.

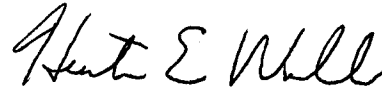
With regard to the Office's other arguments regarding dependent claims, Applicants herein incorporate the arguments presented above with respect to independent claims listed above. In addition, Applicants submit that all dependant claims are allowable based on their own distinct features. However, for brevity, Applicants will forego addressing each of these rejections individually, but reserve the right to do so should it become necessary. Accordingly, Applicants respectfully request that the Office withdraw its rejection.

#### **IV. CONCLUSION**

In addition to the above arguments, Applicants submit that each of the pending claims is patentable for one or more additional unique features. To this extent, Applicants do not acquiesce to the Office's interpretation of the claimed subject matter or the references used in rejecting the claimed subject matter. Additionally, Applicants do not acquiesce to the Office's combinations and modifications of the various references or the motives cited for such combinations and modifications. These features and the appropriateness of the Office's combinations and modifications have not been separately addressed herein for brevity. However, Applicants reserve the right to present such arguments in a later response should one be necessary.

In light of the above, Applicants respectfully submit that all claims are in condition for allowance. Should the Examiner require anything further to place the application in better condition for allowance, the Examiner is invited to contact Applicants' undersigned representative at the number listed below.

Respectfully submitted,



---

Hunter E. Webb  
Reg. No.: 54,593

Date: July 13, 2006

Hoffman, Warnick & D'Alessandro LLC  
75 State Street, 14<sup>th</sup> Floor  
Albany, New York 12207  
(518) 449-0044  
(518) 449-0047 (fax)

RAD/hew